

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA**

KIMBERLY JOHNSON,

Plaintiff,

vs.

PROFESSIONAL ACCOUNT
SERVICES, INC.,

Defendant.

Civil Action No.:

(REMOVAL ACTION)

**NOTICE OF REMOVAL OF
CIVIL ACTION FROM STATE COURT**

**TO: THE HONORABLE JUDGES OF THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

Defendant, Professional Account Services, Inc. (“PASI”), by and through its undersigned counsel, respectfully represents as follows:

1. On or about August 7, 2020, Plaintiff, Kimberly Johnson (hereinafter referred to as “Plaintiff”) filed a civil class action complaint against PASI in the Court of Common Pleas of Lackawanna County, Pennsylvania which was assigned the docket number 2020-CV-3059. *A true copy of the Complaint is attached hereto as Exhibit A.*

2. The Complaint seeks, inter alia, damages for injuries allegedly arising from violations of the federal Fair Debt Collection Practices Act (hereinafter referred to as the “FDCPA”) 15 U.S.C. § 1692 *et seq.* See **Exhibit A.**

3. The District Courts of the United States have original jurisdiction over the above entitled action pursuant to 28 U.S.C. § 1331, as it involves a federal question with regards to the alleged violations of the FDCPA, 15 U.S.C. § 1692 *et seq.*

4. Pursuant to 28 U.S.C. § 1441(a), any such civil action brought in a State court may be removed, but only to the district court of the United States for the district and division embracing the place where such action is pending.

5. Therefore, Cavalry by this notice seeks removal to the United States District Court for the Middle District of Pennsylvania, which embraces the location of the pending Complaint.

6. Furthermore, this Court will have pendent jurisdiction over any other state claims asserted or that may be asserted by the Plaintiff.

WHEREFORE, Defendant, Professional Account Services, Inc., respectfully requests that the above entitled action be removed from the Court of Common Pleas of Lackawanna County, Pennsylvania.

Respectfully submitted,

MAURICE WUTSCHER, LLP

/s/ Shannon Miller

Shannon Miller

10 W. Front Street

Media, PA 19063

(215)789-7151

Attorneys for Defendant

Dated: September 14, 2020

CERTIFICATE OF SERVICE

I, SHANNON MILLER, ESQ., do hereby certify that I have caused a true and correct copy of Defendant's Notice of Removal to Federal Court to be served upon the following parties to the action:

Brett M. Freeman, Esq.
Sabatini Freeman, LLC
216 N. Blakely St.
Dunmore, PA 18512

BY: /s/ Shannon Miller
Shannon Miller, Esquire

Dated: September 14, 2020